

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

GIANNI VERSACE, S.P.A.; GUERLAIN, SOCIÉTÉ  
PAR ACTIONS SIMPLIFIÉE (SAS); GUERLAIN,  
INC.; HERMÈS INTERNATIONAL; HUBLOT SA,  
GENÈVE; KENZO; LVMH FRAGRANCE BRANDS;  
LVMH SWISS MANUFACTURES S.A.; MICHAEL  
KORS, L.L.C.; THE NORTH FACE APPAREL  
CORP.; PARFUMS CHRISTIAN DIOR; PRL USA  
HOLDINGS, INC.; RIVER LIGHT V, L.P. and TORY  
BURCH LLC; TIMBERLAND, a division of VF  
OUTDOOR, LLC, and TBL LICENSING LLC,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and  
XYZ COMPANIES,

Defendants.

CIVIL ACTION NO.

19 CV \_\_\_\_\_

**COMPLAINT**

Plaintiffs Gianni Versace, S.p.A.; Guerlain, Société Par Actions Simplifiée (SAS) and Guerlain, Inc.; Hermès International; Hublot SA, Genève; Kenzo; LVMH Fragrance Brands; LVMH Swiss Manufactures S.A.; Michael Kors, L.L.C.; The North Face Apparel Corp.; Parfums Christian Dior; and PRL USA Holdings, Inc.; River Light V, L.P. and Tory Burch LLC; and Timberland, a division of VF Outdoor, LLC, and TBL Licensing LLC (all collectively, “Plaintiffs”), through their attorneys, complaining of Defendants, allege as follows:

**STATEMENT OF THE CASE**

1. Plaintiffs seek monetary and injunctive relief against Defendants for numerous causes of action, including but not limited to, (i) trademark counterfeiting, in violation of 15 U.S.C. § 1114; (ii) trademark infringement, in violation of 15 U.S.C. § 1114; (iii) false descriptions/false

designations of origin, in violation of 15 U.S.C. § 1125; and (iv) common law trademark infringement and unfair competition.

2. Certain areas of New York City have long been major distribution hubs for counterfeit goods that are sold throughout the United States. Wholesale and retail sales of counterfeit goods occur frequently and regularly from locations around the city. Plaintiffs in this case, and trademark holders in general, have been plagued by the sale and distribution of counterfeit goods at locations all over New York City for years. To combat this illegal activity and protect their world-famous and valuable names, reputations, and trademarks, Plaintiffs have, at great expense, commenced and led enforcement efforts in and around New York City. Plaintiffs regularly work with law enforcement in operations against the individuals and entities selling counterfeit goods bearing its trademarks. Arrests for trademark counterfeiting have been made routinely by the New York City Police Department and by other agencies. The Mayor's Office of Special Enforcement for the City of New York has conducted numerous enforcement operations against the sellers of counterfeit goods.

### **JURISDICTION AND VENUE**

3. These claims arise under the Trademark Act of 1946, 15 U.S.C. § 1051, *et seq.*, particularly under 15 U.S.C. § 1114(1). This Court has subject matter jurisdiction over the claims in this action which relate to trademark counterfeiting and infringement, dilution and false designations of origin and false descriptions pursuant to the provisions of 28 U.S.C. §§ 1331 and 1338 and 15 U.S.C. § 1121.

4. This Court has supplemental jurisdiction over the claims in this Complaint which arise under state statutory and common law pursuant to 28 U.S.C. § 1367(a), since the state law

claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

5. Venue is proper in this judicial district under 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to the claims alleged by Plaintiffs occurred within Kings County in New York State.

### **THE PARTIES**

6. Plaintiff Gianni Versace, S.p.A., now known as Gianni Versace, S.r.l., is a company organized under the laws of Italy with its principal place of business at Piazza Einaudi Nr. 4, 20124, Milan Italy (“Versace”).

7. Plaintiff Guerlain, Société Par Actions Simplifiée (SAS), is a French corporation having a principal place of business at 68, Avenue Des Champs Elysees, Paris, France 7500.

8. Plaintiff Guerlain, Inc. is a New York corporation having a principal place of business at 19 East 57th Street, New York, New York 10022 (Guerlain and Guerlain, Inc., collectively, “Guerlain”).

9. Plaintiff Hermès International is a corporation, organized and existing under the laws of France, having its principal place of business located at 24, rue du Faubourg Saint-Honore, Paris, France (“Hermès”).

10. Plaintiff Hublot SA, Genève is a Swiss corporation having a principal place of business at 30 Rue du Rhône, 1204 Genève, Switzerland (“Hublot”).

11. Plaintiff Kenzo is a French corporation having a principal place of business at 18 Rue Vivienne, Paris, France 75002 (“Kenzo”).

12. Plaintiff LVMH Fragrance Brands is a French corporation (société par actions simplifiée) having a principal place of business at 77, Rue Anatole France, Levallois Perret, France 92300 (“Givenchy”).

13. Plaintiff LVMH Swiss Manufactures S.A. is a Swiss corporation having a principal place of business at 6A Rue Louis-Joseph Chevrolet, 2300 La Chaux de Fonds, Switzerland (“TAG”).

14. Plaintiff Michael Kors, L.L.C. is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business located at 11 West 42nd Street, New York, NY 10036 (“MK”).

15. Plaintiff The North Face Apparel Corp. is a corporation duly organized and existing under the laws of the State of Delaware, with a corporate address of 3411 Silverside Road, Wilmington, DE 19810 (“TNF”).

16. Plaintiff Parfums Christian Dior is a French corporation having a principal place of business at 33 Avenue Hoche, Paris, France 75008 (“Dior”).

17. Plaintiff PRL USA Holdings, Inc. is a Delaware Corporation with its principal place of business located at 650 Madison Avenue, New York, NY 10022 (“PRL”). PRL is the successor in interest to all trademark ownership rights previously held by Polo Ralph Lauren, L.P.

18. Plaintiff River Light V, L.P. is a limited partnership and subsidiary of Tory Burch LLC with a principal place of business located at 11 West 19th Street, 7th Floor, New York, NY 10011.

19. Plaintiff Tory Burch LLC is a corporation duly organized and existing under the laws of the State of Delaware with a principal place of business located at 11 West 19th Street, 7th Floor, New York, NY 10011 (River Light V, L.P. and Tory Burch LLC collectively, “Tory Burch”).

20. Plaintiff Timberland, a division of VF Outdoor, LLC, is a Delaware Company with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885.

21. Plaintiff TBL Licensing LLC, an affiliate of Timberland, is a Delaware Company with a principal place of business located at 200 Domain Drive, Stratham, New Hampshire 03885 (collectively with Timberland, a division of VF Outdoor, LLC, “Timberland”).

22. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto defendants various John Does, Jane Does, and XYZ Companies (collectively referred to as “Defendants”), are and have been doing business in Kings Country in the State of New York at the following locations: The Aqua Duck Flea Market, 700 Fountain Avenue, Brooklyn, New York 11208, including but not limited to the 17 booths identified in Figure A below; and the White Ford Van, New York License Plate No. FJD-4927 behind booth no. 2 within the Aqua Duck Flea Market.

23. Plaintiffs are informed and believe and thereupon allege that at all times relevant hereto Defendants have purchased, sold, and/or distributed counterfeit goods bearing Plaintiffs’ Federally Registered Trademarks, as defined below in paragraph 29.

24. Upon information and belief, due to the nature of Defendants and their business practices, the identities of the various John Does, Jane Does, and XYZ Companies are not presently known, and the Complaint will be amended, if appropriate, to include the name or names of said individuals or companies when such information becomes available.

#### **PLAINTIFFS’ ACTIVITIES**

25. Plaintiffs are industry leaders in the design, marketing, and distribution of a variety of merchandise including but not limited to apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, and watches bearing Plaintiffs’ Federally Registered Trademarks.

26. For decades, Plaintiffs have developed their reputations and distinctive images across expanding product lines in both domestic and international markets.

27. Plaintiffs advertise, market, and sell their merchandise through numerous distribution channels including but not limited to exclusive retail stores, department stores, and online through Plaintiffs' websites.

28. Plaintiffs annually expend millions of dollars advertising their products.

29. Plaintiffs are the owners of numerous trademark registrations with the United States Patent & Trademark Office, including but not limited to those listed on Exhibit A attached hereto (hereinafter collectively referred to as "Plaintiffs' Federally Registered Trademarks").

30. Plaintiffs are the exclusive distributors or licensors in the United States of their merchandise, all of which bear one or more of Plaintiffs' Federally Registered Trademarks.

31. Plaintiffs are responsible for designing and/or licensing, assembling, finishing, marketing and selling in interstate commerce high quality apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and many other products.

32. Plaintiffs' Federally Registered Trademarks are in full force and effect and many have become incontestable pursuant to 15 U.S.C. § 1065.

33. Plaintiffs have used Plaintiffs' Federally Registered Trademarks for many years, and in some instances decades, on and in connection with their merchandise.

34. Plaintiffs' Federally Registered Trademarks identify high quality merchandise originating with Plaintiffs.

35. Plaintiffs have gone and continue to go to great lengths to protect their names and enforce Plaintiffs' Federally Registered Trademarks.

### **DEFENDANTS' COUNTERFEITING & INFRINGING ACTIVITIES**

36. Upon information and belief, Defendants have counterfeited and infringed, continue to counterfeit and infringe, and threaten to further counterfeit infringe Plaintiffs' Federally Registered Trademarks by manufacturing, distributing and selling unauthorized merchandise, including but not limited to high quality apparel, belts, watches, handbags, and fragrances. The unauthorized products, which are being manufactured, distributed, and/or sold by Defendants, bear unauthorized copies of Plaintiffs' Federally Registered Trademarks. Defendants' counterfeiting and infringing activities constitute unauthorized public display and distribution of products bearing Plaintiffs' Federally Registered Trademarks.

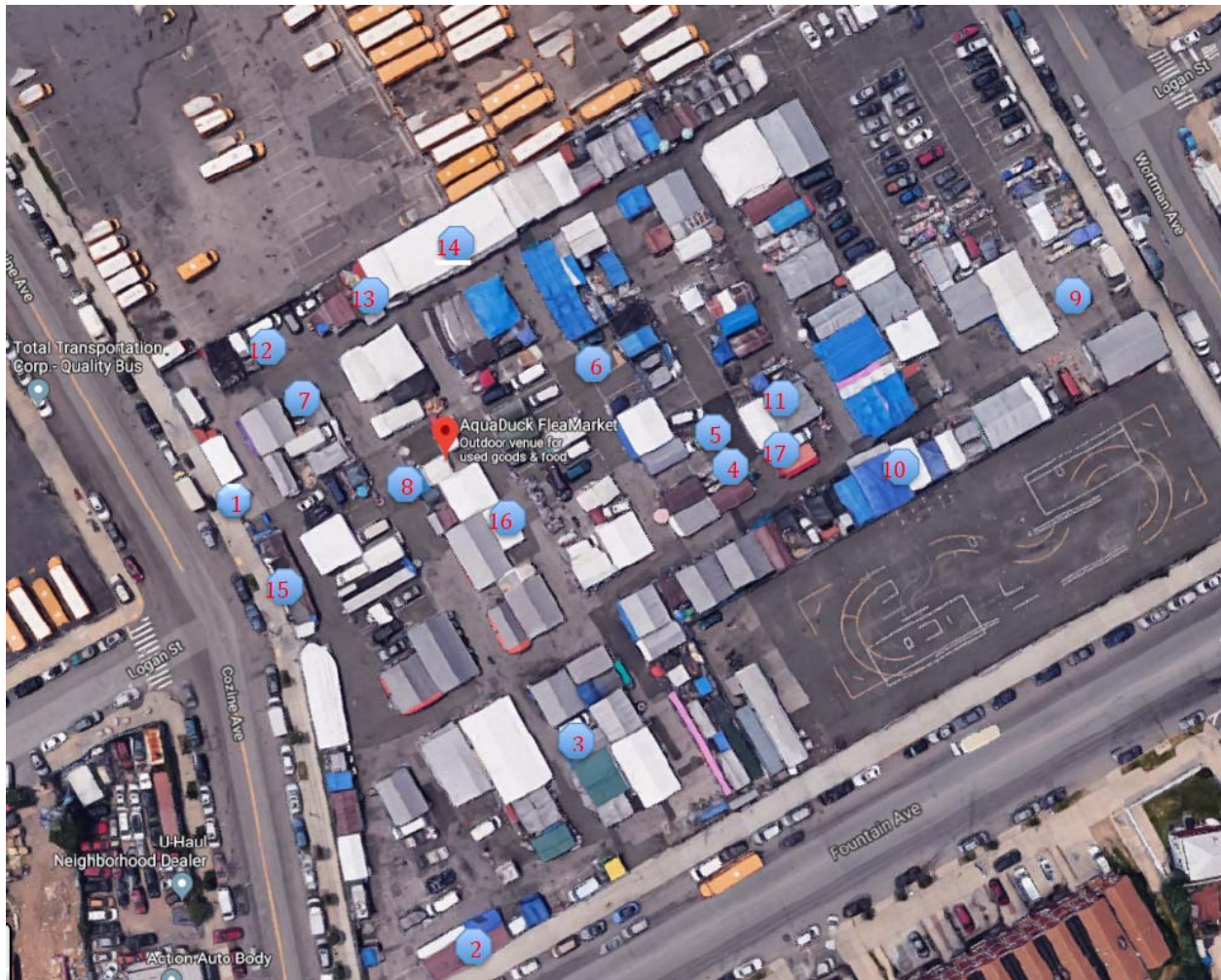
37. Long after Plaintiffs' use and registration of Plaintiffs' Federally Registered Trademarks, Defendants, on information and belief, commenced the manufacture, distribution, and/or sale of merchandise bearing counterfeits and infringements of Plaintiffs' Federally Registered Trademarks as those trademarks appear on Plaintiffs' products and as shown in Exhibit A to this Complaint.

38. Upon information and belief, the activities of Defendants complained of herein constitute willful and intentional infringement of Plaintiffs' Federally Registered Trademarks, are in total disregard of Plaintiffs' rights, and were commenced and have continued in spite of Defendants' knowledge that the use of any of Plaintiffs' Federally Registered Trademarks, or copies or colorable imitations thereof, was and is in direct contravention of Plaintiffs' rights.

39. Use by Defendants of copies of Plaintiffs' Federally Registered Trademarks has been without Plaintiffs' consent, is likely to cause confusion and mistake in the minds of the purchasing public, and, in particular, tends to and does falsely create the impression that the goods sold by Defendants are authorized, sponsored, or approved by Plaintiffs when, in fact, they are not.



**A. Aqua Duck Flea Market**  
**700 Fountain Avenue**  
**Brooklyn, New York 11208**



*Figure A. Map of Aqua Duck Flea Market*

40. On October 4, 2019, Plaintiffs dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was being manufactured, distributed, and/or sold.

41. While at booth no. 1 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Versace. The investigator then made an evidential purchase of a counterfeit Versace shirt for twenty-five U.S. Dollars (\$25.00).



42. While at booth no. 2 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Timberland. The investigator also observed counterfeit merchandise bearing the Federally Registered Trademarks of Timberland being stored in a White Ford van, New York License Plate No. FJD-4927 behind booth no. 2 within the confines of the flea market. The investigator then made an evidential purchase of counterfeit Timberland boots for fifty U.S. Dollars (\$50.00).

43. While at booth no. 3 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Dior, Givenchy, Guerlain, Kenzo, and Polo. The investigator then made an evidential purchase of counterfeit Dior and Givenchy fragrance for forty U.S. Dollars (\$40.00).

44. While at booth no. 4 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of MK, TNF, and Versace. The investigator then made an evidential purchase of a counterfeit MK handbag and counterfeit TNF jacket for seventy U.S. Dollars (\$70.00).

45. While at booth no. 5 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Hermès. The investigator then made an evidential purchase of a counterfeit Hermès scarf and a counterfeit Hermès handbag for thirty-five U.S. Dollars (\$35.00).

46. While at booth no. 6 in Figure A, the investigator observed counterfeit sunglasses offered for sale bearing the Federally Registered Trademarks of Tory Burch.

47. While at booth no. 7 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of PRL. The investigator then made an evidential purchase of a counterfeit PRL sweat suit for thirty-five U.S. Dollars (\$35.00).

48. While at booth no. 8 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of PRL. The investigator then made an evidential purchase of a counterfeit PRL sweat suit for thirty-five U.S. Dollars (\$35.00).

49. On October 5, 2019, Plaintiffs again dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was still being manufactured, distributed, and/or sold.

50. While at booth no. 9 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of PRL, Versace, and another brand. The investigator then made an evidential purchase of counterfeit PRL apparel and another brand's apparel for thirty-two U.S. Dollars (\$32.00).

51. While at booth no. 10 in Figure A, the investigator observed counterfeit apparel, accessories, and shoes offered for sale bearing the Federally Registered Trademarks of Versace.

52. While at booth no. 11 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Tory Burch.

53. While at booth no. 12 in Figure A, the investigator observed counterfeit merchandise offered for sale bearing the Federally Registered Trademarks of Versace.

54. While at booth no. 13 in Figure A, the investigator observed counterfeit handbags offered for sale bearing the Federally Registered Trademarks of MK and Tory Burch. The investigator then made an evidential purchase of a counterfeit MK handbag for twenty-seven U.S. Dollars (\$27.00).

55. While at booth no. 14 in Figure A, the investigator observed counterfeit fragrance offered for sale bearing the Federally Registered Trademarks of Dior, Givenchy, Kenzo, and Polo and counterfeit watches offered for sale bearing the Federally Registered Trademarks Hublot, MK,

and TAG. The investigator then made an evidential purchase of counterfeit Hublot and MK watches for eighty U.S. Dollars (\$80.00).

56. While at booth no. 15 in Figure A, the investigator observed counterfeit watches offered for sale bearing the Federally Registered Trademarks of MK.

57. On October 12, 2019, Plaintiffs again dispatched an investigator to this location to assess whether or not counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks was still being manufactured, distributed, and/or sold.

58. While at booth no. 16 in Figure A, the investigator observed counterfeit handbags offered for sale bearing the Federally Registered Trademarks of MK and Tory Burch. The investigator then made an evidential purchase of a counterfeit Tory Burch handbag for forty U.S. Dollars (\$40.00).

59. While at booth no. 17 in Figure A, the investigator observed counterfeit handbags offered for sale bearing the Federally Registered Trademarks of MK and Tory Burch. The investigator then made an evidential purchase of a counterfeit MK handbag for twenty-five U.S. Dollars (\$25.00).

60. Upon information and belief, the defendants at the booths identified in Figure A and other defendant-vendors at the Aqua Duck Flea Market continue to manufacture, distribute, and/or sell counterfeit merchandise bearing Plaintiffs' Federally Registered Trademarks.

**FIRST CAUSE OF ACTION  
TRADEMARK COUNTERFEITING  
15 U.S.C §1114**

61. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

62. Defendants have used spurious designations that are identical with, or substantially indistinguishable from, Plaintiffs' Federally Registered Trademarks on goods covered by registrations for Plaintiffs' Federally Registered Trademarks.

63. Defendants are intentionally and willfully using these spurious designations knowing they are counterfeit in connection with the advertising, sale, offering for sale and distribution of counterfeit goods for their own personal financial gain and such intentional and willful conduct by the Defendants makes this an exceptional case.

64. Defendants' use of the Plaintiffs' Federally Registered Trademarks to advertise, offer for sale, sell and distribute Defendants' counterfeit products was and is without the consent of Plaintiffs.

65. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks on and in connection with the advertising and sale of counterfeit goods constitutes Defendants' use of Plaintiffs' Federally Registered Trademarks in commerce.

66. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above is likely to:

- (a) cause confusion, mistake and deception;
- (b) cause the public to believe that Defendants' counterfeit products are the same as Plaintiffs' products and/or that Defendants are authorized, sponsored or approved by Plaintiffs or that Defendants are affiliated, connected or associated with or in some way related to Plaintiffs; and

- (c) result in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from the reputation of Plaintiffs and Plaintiffs' Federally Registered Trademarks all to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

67. Defendants' acts as aforesaid constitute trademark counterfeiting in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

68. Plaintiffs have no adequate remedy at law and have suffered and continue to suffer irreparable harm and damage as a result of Defendants' acts as aforesaid in an amount not thus far determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

69. Defendants' wrongful acts of counterfeiting will continue unless enjoined by this Court.

70. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**SECOND CAUSE OF ACTION  
TRADEMARK INFRINGEMENT  
15 U.S.C. §1114**

71. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

72. Plaintiffs' Federally Registered Trademarks are fanciful and arbitrary and are associated in the mind of the public with Plaintiffs.

73. Based on Plaintiffs' extensive advertising, sales and the wide popularity of Plaintiffs' products, Plaintiffs' Federally Registered Trademarks have acquired secondary meaning so that any product and advertisement bearing such trademarks is immediately associated by purchasers and the public as being a product and affiliate of Plaintiffs.

74. Defendants use Plaintiffs' Federally Registered Trademarks in connection with Defendants' sale, distribution and advertising of their counterfeit and infringing goods.

75. Defendants' activities as aforesaid constitute Defendants' use in commerce of Plaintiffs' Federally Registered Trademarks.

76. Defendants have used Plaintiffs' Federally Registered Trademarks without Plaintiffs' consent or authorization. Defendants' use, including the sale and distribution of infringing products in interstate commerce, is likely to cause confusion and mistake in the minds of the public, leading the public to believe that Defendants' products emanate or originate from Plaintiffs, or that Plaintiffs have approved, sponsored or otherwise associated themselves with Defendants, which is untrue.

77. Defendants have intentionally used Plaintiffs' Federally Registered Trademarks in connection with the offering for sale, sale, and distribution of counterfeit goods, knowing they are the exclusive property of Plaintiffs.

78. Defendants' conduct is intended to exploit the goodwill and reputation associated with Plaintiffs' Registered Trademarks.

79. Plaintiffs have no control over the quality of Defendants' counterfeit merchandise. Because of the very real likelihood of confusion as to the source of Defendants' products, Plaintiffs' reputation and valuable goodwill in the Trademarks is at the mercy of Defendants' unscrupulous tactics.

80. Defendants' activities as aforesaid create the false and misleading impression that Defendants are sanctioned, assigned or authorized by Plaintiffs to use Plaintiffs' Federally Registered Trademarks to advertise, manufacture, distribute, appraise, offer for sale or sell counterfeit products bearing Plaintiffs' Federally Registered Trademarks when Defendants are not so authorized.



81. Defendants engage in the aforementioned activity with the intent to confuse and deceive consumers into believing that Defendants and the goods they sell are in some way sponsored by, affiliated or associated with Plaintiffs when the Defendants are not.

82. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks as set forth above has resulted in Defendants unfairly benefiting from Plaintiffs' advertising and promotion and profiting from Plaintiffs' reputation and Plaintiffs' Federally Registered Trademarks, to the substantial and irreparable injury of the public, Plaintiffs and Plaintiffs' Federally Registered Trademarks and the substantial goodwill represented thereby.

83. Defendants' aforesaid acts constitute trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1114.

84. Defendants' acts have caused, and will continue to cause, great and irreparable injury to Plaintiffs, and unless such acts are restrained by this Court, they will continue, thereby causing Plaintiffs to continue to suffer great and irreparable injury. Plaintiffs have no adequate remedy at law.

85. Plaintiffs are informed and believe and thereon allege that Defendants' infringement is both intentional and egregious.

86. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

87. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**THIRD CAUSE OF ACTION  
FALSE DESIGNATIONS OF ORIGIN,  
FALSE DESCRIPTIONS AND REPRESENTATIONS  
15 U.S.C. §1125(a)**

88. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

89. Defendants have, in connection with their goods, used in commerce, and continue to use in commerce, Plaintiffs' Federally Registered Trademarks.

90. Defendants have affixed, applied and used in connection with their sale of goods, false designations of origin and false and misleading descriptions and representations, including Plaintiffs' Federally Registered Trademarks, which tend falsely to describe the origin, sponsorship, association or approval by Plaintiffs of the goods sold by the Defendants.

91. Defendants use one or more of Plaintiffs' Federally Registered Trademarks with full knowledge of the falsity of such designations of origin, descriptions and representations, all to the detriment of Plaintiffs.

92. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods constitutes false descriptions and representations tending to falsely describe or represent Defendants and Defendants' products as being authorized, sponsored, affiliated or associated with Plaintiffs.

93. Defendants use one or more of Plaintiffs' Federally Registered Trademarks on counterfeit goods with the express intent to cause confusion and mistake, to deceive and mislead the purchasing public, to trade upon the high quality reputation of Plaintiffs and to improperly appropriate to themselves the valuable trademark rights of Plaintiffs.

94. Defendants' aforesaid acts constitute the use in commerce of false designations of origin and false and/or misleading descriptions or representations, tending to falsely or misleadingly

describe and/or represent Defendants' products as those of Plaintiffs in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

95. Defendants' wrongful acts will continue unless enjoined by this Court.

96. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

97. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FOURTH CAUSE OF ACTION  
FEDERAL TRADEMARK DILUTION  
15 U.S.C. & 1125(c)**

98. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

99. Plaintiffs are the exclusive owners of Plaintiffs' Federally Registered Trademarks listed on Exhibit A attached hereto.

100. Defendants' use of Plaintiffs' Federally Registered Trademarks on the counterfeit goods they sell constitutes Defendants' commercial use in commerce of Plaintiffs' Federally Registered Trademarks.

101. Plaintiffs' Federally Registered Trademarks have been used for years, and in some instances decades, and are so globally recognized and associated with Plaintiffs that they are entitled to be recognized as famous and distinctive under 15 U.S.C. § 1125(c).

102. Plaintiffs' Federally Registered Trademarks have come to have a secondary meaning indicative of origin, relationship, sponsorship and/or association with the Plaintiffs and its distinctive

reputation for high quality. The purchasing public is likely to attribute to Plaintiffs, Defendants' use of Plaintiffs' Federally Registered Trademarks as a source of origin, authorization and/or sponsorship for the products Defendants sell and further, purchase Defendants' products in the erroneous belief that Defendants are associated with, sponsored by or affiliated with Plaintiffs, when Defendants are not.

103. Plaintiffs have not authorized or licensed the use of Plaintiffs' Federally Registered Trademarks to Defendants.

104. Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks in their marketing, sale and distribution of counterfeit products are diluting the distinctive quality of Plaintiffs' Federally Registered Trademarks and the goodwill associated with them in violation of Section 43(a) of the Lanham Act, 15 U.S.C § 1125(c).

105. Such conduct has injured Plaintiffs and said injury will continue unless the Court enjoins Defendants from committing further wrongful acts.

106. Upon information and belief, Defendants intentionally and willfully utilized Plaintiffs' Federally Registered Trademarks and traded on Plaintiffs' reputation and goodwill.

107. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

108. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of Two Million Dollars (\$2,000,000) per Plaintiff.

**FIFTH CAUSE OF ACTION  
INJURY TO BUSINESS REPUTATION AND DILUTION  
NEW YORK GENERAL BUSINESS LAW § 360-1**

109. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

110. Plaintiffs, on behalf of the general public, as well as for themselves seek recovery from Defendants for violation of New York General Business Law § 360-1, et seq.

111. By virtue of Defendants' unauthorized use of Plaintiffs' Federally Registered Trademarks, such use trading on the good will associated with Plaintiffs, Defendants have misled and will continue to mislead the public into assuming a connection between Plaintiffs and Defendants' products.

112. By falsely suggesting a connection with or sponsorship by Plaintiffs, Defendants are likely to cause public confusion constituting unfair competition within the meaning of New York Business Law § 360-1.

113. If such action on the part of Defendants continue, Plaintiffs will suffer irreparable harm of a continuing nature for which there is no adequate remedy at law.

114. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

115. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

**SIXTH CAUSE OF ACTION  
COMMON LAW TRADEMARK INFRINGEMENT**

116. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

117. Defendants' acts previously alleged herein constitute common law trademark infringement.

118. Plaintiffs are without adequate remedy at law, as Defendants' acts have caused Plaintiffs irreparable harm to its business reputation, good will and stature in the business community.

119. Plaintiffs are informed and believe and thereon allege that Defendants committed the above alleged acts oppressively, fraudulently, maliciously and in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore entitled to exemplary and punitive damages pursuant to the common law of the State of New York in an amount sufficient to punish, deter and make an example of Defendants.

120. The manufacture, distribution and sale of the unauthorized and infringing products by Defendants are without any permission, license or other authorization from Plaintiffs. The said unauthorized products are being distributed and sold in interstate commerce.

121. Plaintiffs have no adequate remedy at law and are suffering irreparable harm and damage as a result of the aforesaid acts of Defendants in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.

122. Upon information and belief, Defendants have obtained gains, profits and advantages as a result of their wrongful acts in an amount thus far not determined but believed to be in excess of One Million Dollars (\$1,000,000) per Plaintiff.



**SEVENTH CAUSE OF ACTION  
MISAPPROPRIATION AND UNFAIR COMPETITION  
UNDER NEW YORK COMMON LAW**

123. Plaintiffs repeat and reallege the allegations of the previous paragraphs as though fully set forth herein.

124. Defendants' aforesaid acts constitute misappropriation and infringement of Plaintiffs' property rights, goodwill and reputation and unfair competition under the common law of the State of New York.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand judgment against Defendants as follows:

- I. That preliminary and permanent injunctions be issued enjoining and restraining Defendants and their officers, agents, servants, employees and attorneys and all those in active concert or participation with them, from:
  - A. Using any reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks to identify any goods or the rendering of any services not authorized by Plaintiffs;
  - B. Engaging in any course of conduct likely to cause confusion, deception or mistake, or to injure Plaintiffs' business reputation or dilute the distinctive quality of Plaintiffs' name and Plaintiffs' Federally Registered Trademarks;
  - C. Using a false description or representation including words or other symbols tending to falsely describe or represent Defendants' unauthorized goods as being those of Plaintiffs or sponsored by or associated with Plaintiffs and from offering such goods into commerce;

- D. Further infringing Plaintiffs' Federally Registered Trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising, promoting, renting, displaying or otherwise disposing of any products not authorized by Plaintiffs bearing any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;
- E. Using any simulation, reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the rental, promotion, advertisement, display, sale, offering for sale, manufacture, production, circulation or distribution of any unauthorized products in such fashion as to relate or connect, or tend to relate or connect, such products in any way to Plaintiffs, or to any goods sold, manufactured, sponsored or approved by, or connected with Plaintiffs;
- F. Making any statement or representation whatsoever, or using any false designation of origin or false description, or performing any act, which can or is likely to lead the trade or public, or individual members thereof, to believe that any products manufactured, distributed, sold or rented by Defendants is in any manner associated or connected with Plaintiffs, or is sold, manufactured, licensed, sponsored, approved or authorized by Plaintiffs;
- G. Constituting an infringement of any of Plaintiffs' Federally Registered Trademarks or of Plaintiffs' rights in, or to use or to exploit, said Registered Trademarks, or constituting any dilution of Plaintiffs' name, reputation or goodwill;
- H. Secreting, destroying, altering, removing, or otherwise dealing with the unauthorized products or any books or records which contain any information relating to the importing, manufacturing, producing, distributing, circulating, selling, marketing,

offering for sale, advertising, promoting, renting or displaying of all unauthorized products which infringe Plaintiffs' Federally Registered Trademarks;

I. Selling, offering for sale, or advertising any merchandise bearing Plaintiffs' Federally Registered Trademarks on the Internet or in e-commerce, including but not limited to all forms of social media; and

J. Effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (A) through (I).

II. Directing that Defendants deliver up for destruction to Plaintiffs all unauthorized products and advertisements in their possession or under their control bearing any of Plaintiffs' Federally Registered Trademarks or any simulation, reproduction, counterfeit, copy or colorable imitation thereof, and all plates, molds, matrices and other means of production of same pursuant to 15 U.S.C. §1118.

III. Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving any erroneous impression that any products manufactured, sold or otherwise circulated or promoted by Defendants are authorized by Plaintiffs or related in any way to Plaintiffs' products.

IV. Directing Defendants to supply Plaintiffs with the name and address of each person or entity from whom or from which has purchased any item bearing Plaintiffs' Federally Registered Trademarks.

V. Directing Defendants, within thirty (30) days after the service of judgment upon it, with notice of entry thereof, to file with the Court, and serve upon Plaintiffs, a written report under

oath setting forth in detail the manner in which Defendants have complied with paragraphs I through IV above.

VI. Awarding to Plaintiffs the Defendants' profits from its unlawful acts herein alleged as Defendants' total sales of merchandise bearing any one or more of the Plaintiffs' Federally Registered Trademarks, less any elements of cost or deductions proved by Defendants and allowed by law.

VII. Awarding to Plaintiffs the damages from Defendants' unlawful acts herein alleged.

VIII. Pursuant to 15 U.S.C. § 1117(a), directing Defendants to pay Plaintiffs all of the profits assessed pursuant to paragraph VI, *supra*, together with three times the amount of damages assessed pursuant to paragraph VII, *supra*, with prejudgment interest on the foregoing sums.

IX. In the event that the Court determines that Defendants intentionally used a mark knowing that such mark was a counterfeit mark, directing Defendants to pay Plaintiffs:

A. Pursuant to 15 U.S.C. § 1117(a) and (b) all of the profits assessed pursuant to paragraph VI, *supra*; plus,

B. Pursuant to 15 U.S.C. § 1117(a) and (b) three times the profits assessed pursuant to paragraph VI, *supra*, or three times the damages assessed pursuant to paragraph VII, *supra*, whichever is greater; and

C. Prejudgment interest on the foregoing sums at an annual interest rate established under 26 U.S.C. § 6621(a)(2) commencing as of the date of the service of the complaint herein.

X. Ordering that Plaintiffs recover the costs of this action together with reasonable attorneys' and investigators' fees and prejudgment interest in accordance with 15 U.S.C. § 1117.

XI. Directing that this Court retain jurisdiction of this action for the purpose of enabling Plaintiffs to apply to the Court at any time for such further orders and interpretation or execution of any order entered in this action, for the modification of any such order, for the enforcement or compliance therewith and for the punishment of any violations thereof.

XII. Awarding to Plaintiffs such other and further relief as the Court may deem just and proper, together with the costs and disbursements which Plaintiffs have incurred in connection with this action.

Dated: October 15, 2019  
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: 


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*Attorneys for Plaintiffs*


**EXHIBIT A**





**GIANNI VERSACE, S.p.A.**

<b><u>TRADEMARK</u></b>	<b><u>REGISTRATION DATE</u></b>	<b><u>REGISTRATION NUMBER</u></b>	<b><u>GOODS and SERVICES</u></b>
VERSACE	Dec. 16, 1997	2121984	<p>Class 3: cosmetics, namely, day cream, bathfoam, after-shave, deodorants for men and women, perfumed, unperfumed (natural) and hypoallergenic perfumes, cologne, toilet water, fragrances, namely, perfume, toilet water and essence oils for personal use for men and women</p> <p>Class 18: leather or imitations of leather, namely, animal skins and hides, handbags, wallets, luggage, attache cases, tote bags, briefcases, all purpose sport bags, travelling trunks and carry-on bags, shoulder bags, garment bags for travelling, keycases, umbrellas</p> <p>Class 25: clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p>
 <p>“Medusa Head Design”</p>	Aug. 2, 2005	2980455	<p>Class 3: Cosmetics, namely night and day creams, cleaning preparations for the care of the face and body, bath-foam, shaving foam, aftershaves, foundation makeup, nail polish, deodorants for men and women, hand and body soaps, hair shampoos and rinses, hair spray, toothpaste and fragrances, namely perfume, toilet water and essential oils for personal use for men and women</p> <p>Class 8: Tableware, namely cutlery; forks, knives and spoons; sterling silver table forks, knives and spoons; domestic fireplace bellows</p> <p>Class 9: Optical instruments, apparatus and equipments, namely eyeglasses; reading glasses, and optical glasses; sunglasses; spectacles; spectacles frames; monocles; lorgnettes</p> <p>Class 11: Apparatus for lighting, namely, electric lighting fixtures for</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>use on ceilings, chandeliers, electric, incandescent, and halogen light bulbs, safety lamps, candle, electric, oil, and portable paper lanterns, standard lamps; fireplaces; decorative water fountains; lamps</p> <p>Class 14: Articles made of precious metals and alloys of precious metals with or without precious stones, namely rings, necklaces, bracelets, brooches, earrings, tie clips, cuff-links, diamonds, jewelry cases made of precious metal, watches, clocks, chronometers, watch cases, costume jewelry</p> <p>Class 18: Leather and imitation of leather sold in bulk, handbags, wallets, luggage, attache cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, saddlery; leather key chains</p> <p>Class 19: Fireplace surround; floor tiles; wood tile floors; glass tiles; parquet flooring; statuettes of stone, concrete, or marble; non-metal wall panels</p> <p>Class 20: Furniture; mirrors, namely looking glasses; picture frames; chairs; cupboards; cushions; desks; divans; plastic and wood doorknobs; figures of bone, ivory, plaster, plastic, wax and wood; plastic and wood furniture handles for doors, plastic key chains; magazine racks; office furniture; pillows; fitted furniture covers</p> <p>Class 21: Household or kitchen utensils and containers, namely, dinnerware; beverage-ware; glassware; sugar bowls; beer mugs; bottle openers; bowls; candle holders not of precious metal; china ornaments; cookware, namely non-electric frying pans; corkscrews; soap dispensers; figurines in China, crystal, earthenware, glass, porcelain and terracotta; holders for flowers and</p>

<b><u>TRADEMARK</u></b>	<b><u>REGISTRATION DATE</u></b>	<b><u>REGISTRATION NUMBER</u></b>	<b><u>GOODS and SERVICES</u></b>
			<p>plants; perfume atomizers sold empty; plates; pots; soapboxes; soap holders; vases; flower baskets; porcelain and earthenware doorknobs and furniture handles for doors</p> <p>Class 24: Fabric for textile use, fabric of imitation animal skins, fabric for boots and shoes, bath linen; bed linen; blankets; curtains; unfitted furniture covers; handkerchiefs; kitchen towels; textile wall hangings</p> <p>Class 25: Clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p> <p>Class 27: Carpets, rugs, mats and matting, linoleum and other materials for covering existing floors; non-textile wall hangings; non-textile wall decorations</p>
 <p>“Greca Design”</p>	Jan. 2, 2007	3194501	<p>Class 3: bath foam, deodorants for men and women, fragrances, namely, perfume, toilet water</p> <p>Class 9: glasses, sunglasses, spectacles, spectacle frames, and cases</p> <p>Class 14: Articles made of precious metals and alloys of precious metals, with or without precious stones, namely, rings, necklaces, bracelets, earrings, tie clips, cuff-links, watches, costume jewellery</p> <p>Class 16: writing and marking instruments, namely, pens</p> <p>Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, attaché cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling</p> <p>Class 24: Fabric for textile use, fabric for boots and shoes, bath linen, bed</p>

<b><u>TRADEMARK</u></b>	<b><u>REGISTRATION DATE</u></b>	<b><u>REGISTRATION NUMBER</u></b>	<b><u>GOODS and SERVICES</u></b>
			<p>linen; bed blankets; unfitted fabric furniture covers</p> <p>Class 25: Clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, t-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p>
 <p>“Greca Element Design”</p>	Jun. 24, 2008	3453992	<p>Class 3: bath foam, after shaves, deodorants for men and women, fragrances, perfume</p> <p>Class 9: glasses, sunglasses, spectacles</p> <p>Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, tote bags, key cases</p> <p>Class 20: Furniture; mirrors, namely, looking glasses; cushions; desks; divans; office furniture; pillows; parts and fittings for the aforesaid furniture goods, namely, fitted furniture covers not of paper</p> <p>Class 24: bath linen; bed linen; bed blankets</p> <p>Class 25: Clothing for men, women and children, namely, belts, coats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, shirts and chemises, T-shirts, underwear, socks and stockings, gloves, ties, scarves, hats and caps, shoes and slippers</p> <p>Class 26: clothing buttons</p>
 <p>“Lion Head Design”</p>	Apr. 4, 2017	5173618	<p>Class 3: Cosmetics, including night and day creams; preparations for cleaning the face and body; bath foam; shaving foam after shave; make-up foundations; lip gloss; shoe wax; mascara; cosmetic masks; eyebrow pencils; pencils for cosmetic purposes, nail varnish; deodorants for men and women, hand and body soap, shampoo and hair coloring preparations in the nature of tints; hair lotions and lotions for cosmetic purposes; hair lacquers; dentifrices, fragrances; perfumery, eau</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>de Cologne, lavender water, scented water being perfumery and essential oils for personal use, for men and women; bases for flower perfumes in the nature of essential oils; sun-tanning preparations being cosmetics; cosmetic preparations for baths; feminine hygiene cleansing towelettes; feminine deodorant sprays; skincare cosmetics; make-up preparations; cleaning agents for household purposes; shaving preparations; non-medicated toiletries; make-up removing preparations; talcum powder, for toilet use</p> <p>Class 9: Optics, namely, spectacles; sunglasses, optical glasses; goggles for sports; optical frames; monocles; theatre glasses; optical goods, namely, glasses and lenses; containers for contact lenses; eyeglasses cases; pince-nez cords; optics, namely, magnifying glasses; correcting optical lenses; optical lenses; lenses for eyeglasses; frames for glasses; electronic schedulers in the nature of electronic agendas; computers, handheld computers; data processing equipment in the nature of a computer mouse; mouse mats; computer keyboards; portable telephones; downloadable ring tones for mobile phones; cell phone straps</p> <p>Class 14: Jewelry, precious stones; horological and chronometric instruments; rings being jewelry; cuff links; bracelets being jewelry; watch bands; watch cases; clock cases; watch chains; jewelry chains; pendants; necklaces being jewelry; chronographs for use as timepieces; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines in the nature of statuettes of precious metal; gold thread jewelry; wire of precious metal, namely, precious metal jewelry chains; silver thread jewelry; cloisonné jewelry; badges of precious metal; clock hands for clock- and watchmaking; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; lockets being jewelry;</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>earrings; jewelry of yellow amber, ivory jewelry; jewelry ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewelry stones; trinkets or fobs, namely, key rings of precious metal; dials for clock and watch making; boxes of precious metal; cases for clock- and watchmaking; jewelry cases, namely, jewelry caskets and boxes; presentation cases for watches, namely, cases adapted for holding watches; pins being jewelry; ornamental pins; jewelry brooches; statuettes of precious metal; paste jewelry being costume jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals</p> <p>Class 18: Leather and imitations of leather; animal skins, hides; women's handbags; pocket wallets; luggage; garment carriers in the nature of garment bags for travel; rucksacks; document cases; sports bags; trunks being luggage; travelling trunks; carry-on bags; sling bags; clothing bags in the nature of garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; notecases, namely, business card cases; key cases; umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery</p> <p>Class 25: Clothing, namely shirts, pants, jeans, sweaters, skirts, dresses; footwear; headgear, namely, headwear; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, motorists' jackets, driving gloves; cyclists' clothing, namely, biking shorts, athletic shirts, cycling gloves; clothing for gymnastics, namely, leotards, leggings; gowns; bath robes; bandanas being scarves; berets; underclothing; smocks, boas being necklets; teddies being undergarments; garters; sports shoes; stockings; slippers; socks;</p>


<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>jodhpurs; short-sleeve shirts; stuff jackets being clothing; top hats; coats; hoods being clothing; belts for clothing; money belts being clothing; tights; collars being clothing; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs in the nature of pocket squares; jackets being clothing; jumper dresses; girdles; gloves being clothing; arm length gloves; mackintoshes; knitwear, namely knit shirts, knit skirts, knit dresses, knit sweaters, knit jackets; jersey clothing, namely, shirts, pants, dresses; leg warmers; leggings being trousers; liveries; sports jerseys; hosiery; swimsuits; pullovers; muffs being clothing; maniples; pelerines; mantillas; sleep masks; miniskirts; cowls being clothing; boxer shorts; bathing drawers; vests, trousers; parkas; pelisses; furs, namely, fur cloaks, fur coats; shirt yokes; pajamas; wristbands being clothing; ponchos; sock suspenders; brassieres; sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear, underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; slips being undergarments; shirt fronts; ankle boots; boots; fur stoles; T-shirts; combinations being clothing; uniforms; veils being clothing; visors being headwear; wooden shoes</p> <p>Class 26: Lace and embroidery, ribbons and braids; buckles for clothing; shoe fasteners; blouse fasteners, namely, snaps and buttons for blouses; shoe buckles; frills for attachment to clothing; lace for edgings for clothing; hook and eye fastening tape; clothing hooks; hooks for corsets; shoe hooks; tinsels as trimmings for clothing; buttons; stud buttons for duvets; stud buttons for shoes; collar studs, namely collar stays; snap fasteners; pins, namely bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; hem tape for clothing</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>Class 35: Advertising services; business management; business administration services; providing office functions; dissemination of advertisements; dissemination of advertising matter; rental of advertising space; commercial and industrial business management assistance and consultancy; professional business consulting; modelling for advertising or sales promotion; franchising, namely, services rendered by a franchisor, that is transfer of business and organizational consultancy assistance in the development and management of a commercial enterprise; provision of information concerning commercial sales of fashion goods; retail store services and on-line retail store services for others featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; presentation of goods on communications media, namely, providing television home shopping services in the field of general consumer merchandise; electronic commerce services, namely, providing information about products via telecommunication networks for advertising and sales purposes; online retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; retail store services and wholesale store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles</p>
	Aug. 1, 2017	5253199	<p>Class 14: Jewellery, precious stones; horological and chronometric instruments; jewelry, namely, rings; cuff links; jewelry, namely, bracelets; watch bands; watch cases being parts of watches; clock cases being parts of clocks; watch chains; jewelry chains; pendants; jewelry, namely, necklaces; chronographs as watches; timepieces;</p>




<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
"Lion Head Design"			<p>stopwatches; chronoscopes; diamonds; tie pins; figurines, namely, statuettes of precious metal; gold thread jewelry; jewelry, namely, wire in the nature of threads of precious metal; jewelry, namely, silver thread; jewellery; jewelry, namely, cloisonné jewellery; badges of precious metal; clock- and watchmaking items, namely, clock hands; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; jewelry, namely, lockets; earrings; jewellery of yellow amber; ivory jewelry; jewelry, namely, ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewellery stones; key rings in the nature of trinkets and fobs of precious metal; dials for clock-and-watch-making; boxes of precious metal; cases for clock- and watchmaking, namely, cases being parts of watches and clocks; jewelry cases in the nature of caskets or boxes; presentation cases for watches being parts of watches; pins being jewelry; ornamental pins; jewelry, namely, brooches; statuettes of precious metal; costume jewelry, namely, paste jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals</p> <p>Class 18: Leather and imitations of leather; animal skins and hides; women's handbags; pocket wallets; luggage; garment carriers, namely, garment bags for travel; rucksacks; document cases; sports bags; luggage, namely, trunks; travelling trunks; carry-on bags; sling bags; garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; business card cases; key cases, umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery</p> <p>Class 25: Clothing, namely, shirts, pants, jeans, sweaters, dresses; footwear; headgear, namely, headwear,</p>

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>hats, caps; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, motorists' jackets; cyclists' clothing, namely, biking shorts, athletic shirts, bicycling gloves; clothing for gymnastics, namely, leotards, leggings, gymnastic shoes; gowns; bath robes; scarves, namely, bandanas; berets; underclothing; smocks; necklets, namely, boas; undergarments, namely, teddies; garters; sports shoes; stockings; slippers; socks; jodhpurs; short-sleeve shirts; shirts; clothing, namely, stuff jackets; top hats; coats; clothing, namely, hoods; belts for clothing; clothing, namely, money belts; tights; clothing, namely, collars; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs, namely, pocket squares; clothing, namely, jackets; skirts; jumper dresses; girdles; clothing, namely, gloves; arm length gloves; mackintoshes in the nature of raincoats; knitwear, namely, knit shirts, knit skirts, knit dresses, knit sweaters, knit jackets; clothing, namely, jerseys; leg warmers; trousers, namely, leggings; liveries; sports jerseys; hosiery; swimsuits; pullovers; clothing, namely, muffs; maniples; pelerines; mantillas; sleep masks; miniskirts; clothing, namely, cowls; boxer shorts; bathing drawers; vests; trousers; parkas; pelisses; fur clothing, namely, fur jackets, fur coats, fur cloaks; shirt yokes; pyjamas; clothing, namely, wristbands; ponchos; sock suspenders; brassieres; sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear; underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; undergarments, namely, slips; shirt fronts; ankle boots; boots; fur stoles; T-shirts; clothing, namely, combinations; uniforms; clothing, namely, veils; headwear, namely, visors; wooden shoes</p>



<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			<p>Class 26: Lace and embroidery, ribbons and braids; clothing accessories, namely, clothing buckles; shoe fasteners; blouse fasteners; shoe buckles; frills for attachment to clothing; lace for edgings; hook and eyes; haberdashery, namely, clothing hooks; hooks for corsets; shoe hooks; tinsels in the nature of lace as trimmings for clothing; buttons; press buttons for duvets; press buttons for shoes; snap fasteners; pins, namely, bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; items for hems on clothing, namely, hem tape</p>
	Feb. 4, 2014	4476530	<p>Class 14: Articles made of precious metals and alloys of precious metals with or without precious stones, namely, rings, necklaces, bracelets, brooches, earrings, tie clips, cufflinks, jewel cases, watches, docks, chronometers, watch cases, costume jewellery, diamonds, and parts and fittings for all the aforesaid goods</p> <p>Class 18: Leather and imitation of leather, handbags, wallets, luggage attaché cases, tote bags, briefcases, sport bags, travelling trunks, carry-on bags, shoulder bags, garment bags for travelling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, bridles and saddlery</p> <p>Class 25: Clothing for men, women and children, namely, belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers</p> <p>Class 26: Lace and embroidery, ribbons and braid, buttons, hooks and eyes, pins namely, hair pins, curling pins, safety pins and needles, buckles, namely, belt buckles and hair buckles</p>




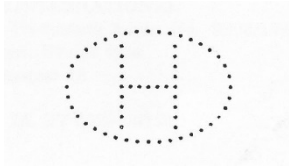

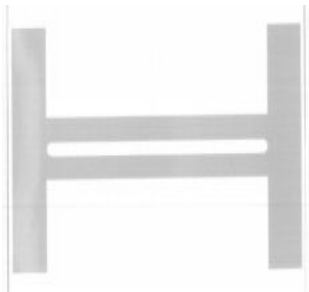
**GUERLAIN SOCIÉTÉ PAR ACTIONS SIMPLIFIÉE (SAS) & GUERLAIN, INC.**

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
<b>GUERLAIN</b>	3	Perfumes, eau de cologne, toilet waters, face cream; face, talcum, and bath powders, loose and in compact form	Dec. 30, 1924	193391	Guerlain, Inc. (NY)
<b>SHALIMAR</b>	3	Perfumes	Aug. 24, 1926	216906	Guerlain, Inc. (NY)
<b>L'HEURE BLEUE</b>	3	Perfumes and toilet water	Mar. 6, 1945	412381	Guerlain, Inc. (NY)
<b>APRES L'ONDEE</b>	3	Toilet water	Mar. 6, 1945	412388	Guerlain, Inc. (NY)
<b>MITSOUKO</b>	3	Perfumes and toilet waters	Mar. 6, 1945	412390	Guerlain, Inc. (NY)
	3	Perfume	Dec. 16, 1975	1027122	Guerlain, Inc. (NY)
	3	Toiletries-namely, perfume, eau de toilette, eau de cologne, eau de parfum, toilet soap	Apr. 16, 1985	1330436	Guerlain, Inc. (NY)
<b>JARDINS DE BAGATELLE</b>	3	Toilet water	Apr. 22, 1986	1390453	Guerlain, Inc. (NY)
<b>SAMSARA</b>		Perfumes, perfume de toilette, eau de toilette, body lotion, body shampoo, and skin creams	July 3, 1990	1604258	Guerlain, Inc. (NY)
<b>HERITAGE</b>	3	Eau de toilette, personal deodorant	Dec. 13, 1994	1867402	Guerlain, Inc. (NY)
<b>GUERLAIN</b>	3, 4, & 21	Perfume; eau de toilette; eau de cologne; eau de parfum; eau de senteur (alcohol-free toilet water); parfum de toilette; body shampoo; bath oil; skin cleansing cream; wrinkle removing skin care preparations; skin moisturizer; skin conditioner; skin cream; night cream; body lotion; body milk; bronzing cream; bronzing powder; make-up; foundation make-up; make-up remover; eye shadow; eye-liner; under eye concealer; mascara; eye make-up remover; face powder;	Dec. 19, 1995	1942534	Guerlain (France SAS)

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
		lipstick; protective base coat for nails; nail polish; after-shave lotion; after-shave balm; shaving cream; personal deodorant; sun screen preparations; scented talcum powder in class 3  Scented candles in class 4  Cosmetic brushes in class 21			
<b>AQUA ALLEGORIA</b>	3	Cologne	Aug. 22, 2000	2379207	Guerlain (France SAS)
<b>L'INSTANT DE GUERLAIN</b>	3	Perfume; eau de cologne; toilet waters; perfumed body milks, body lotions, body gels, body oils, and body powders; perfumed soaps; perfumed moisturizing creams; perfumed talcum powder	Aug. 26, 2003	2756404	Guerlain (France SAS)
<b>HABIT ROUGE</b>	3	Eau de toilette, after-shave lotion, personal deodorant, shower gel	Apr. 20, 2004	2834416	Guerlain (France SAS)
<b>INSOLENCE</b>	3	Perfume, perfumery, toilet waters	Aug. 15, 2006	3129090	Guerlain (France SAS)
<b>IDYLLE</b>	3	Perfumery, perfumes, eau de toilette, personal deodorants, cosmetics	Dec. 22, 2009	3729592	Guerlain (France SAS)
	3	Perfumes	May 3, 2011	3953827	Guerlain (France SAS)
<b>LA PETITE ROBE NOIR</b>	3	Perfumery	Jan. 3, 2012	4080150	Guerlain (France SAS)
<b>IMAGINE</b>	3	Perfumes; eau de Cologne; shaving preparations; aftershave balm; body deodorants	Dec. 4, 2018	5620079	Guerlain (France SAS)

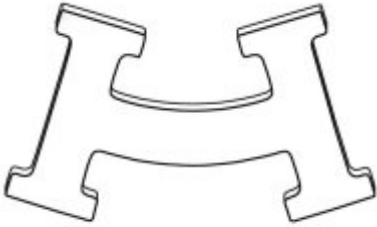
**HERMÈS INTERNATIONAL**

OWNER	TRADEMARK	Reg. Date	Reg. No.	REGISTRAR	Classes
HERMES INTERNATIONAL	HERMÈS	2/29/1972	930149	USA	03
HERMES INTERNATIONAL		12/29/1998	2213940	USA	08, 09, 21, 28, 34
HERMES INTERNATIONAL		6/27/1939	368785	USA	08, 14
HERMES INTERNATIONAL		7/18/1939	369271	USA	14
HERMES INTERNATIONAL		8/1/1939	369681	USA	18
HERMES INTERNATIONAL		8/4/1987	1450841	USA	20
HERMES INTERNATIONAL		8/15/1939	370082	USA	21
HERMES INTERNATIONAL		3/9/1971	909653	USA	24
HERMES INTERNATIONAL		8/8/1939	369944	USA	25
HERMES INTERNATIONAL		10/8/1968	858299	USA	25
HERMES INTERNATIONAL		1/16/2007	3198963	USA	35
HERMES INTERNATIONAL		12/27/2005	3036116	USA	35
HERMES INTERNATIONAL		8/15/1978	1099896	USA	42
HERMES INTERNATIONAL		5/1/2001	2447278	USA	08, 09, 16, 20, 24, 28, 34
HERMES INTERNATIONAL		10/8/1985	1364533	USA	21
HERMES INTERNATIONAL		1/6/1970	883588	USA	03, 14, 18, 25
HERMES INTERNATIONAL		1/16/2007	3198973	USA	35
HERMES INTERNATIONAL		12/27/2005	3036117	USA	35
HERMES INTERNATIONAL		9/24/2002	2623070	USA	37, 40, 41
HERMES INTERNATIONAL		8/15/1978	1099897	USA	42
HERMES INTERNATIONAL		9/4/1984	1292597	USA	03, 09, 14, 16, 18, 24, 25, 28, 34
HERMES INTERNATIONAL		5/27/1975	1011908	USA	14





HERMES INTERNATIONAL		11/23/1993	1806107	USA	18
HERMES INTERNATIONAL		3/20/2001	2436099	USA	03, 08, 09, 14, 16, 18, 20, 24, 25, 28, 34
HERMES INTERNATIONAL		9/6/2005	2991927	USA	16, 18
HERMES INTERNATIONAL		12/4/2007	3348789	USA	06, 08, 14, 16, 18, 21, 24, 25, 26, 28, 34
HERMES INTERNATIONAL		1/20/2009	3564868	USA	06, 08, 14, 16, 18, 20, 21, 22, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	<b>TERRE D'HERMES</b>	4/11/2006	3079963	USA	03
HERMES INTERNATIONAL		4/27/2007	3233558	USA	06, 14, 18, 25, 26

HERMES INTERNATIONAL		4/27/2007	3233557	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL	<b>LINDY</b>	48/5/2008	3480825	USA	18
HERMES INTERNATIONAL		1/13/2009	3561331	USA	06, 14, 16, 18, 21, 25, 26, 34
HERMES INTERNATIONAL		3/29/2011	3936105	USA	18
HERMES INTERNATIONAL		4/5/2011	3939358	USA	18
HERMES INTERNATIONAL		7/26/11	4000067	USA	3, 14, 18, 25, 35

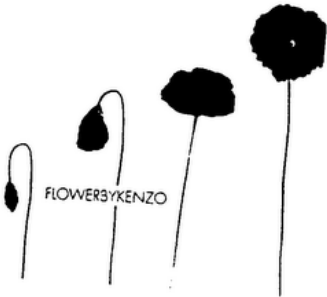



HERMES INTERNATIONAL		2/17/2015	4687132	USA	25, 26
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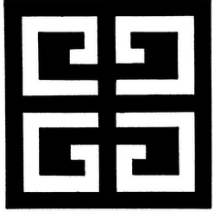
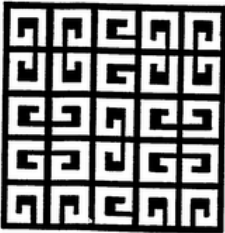
**HUBLOT SA, GENÈVE**

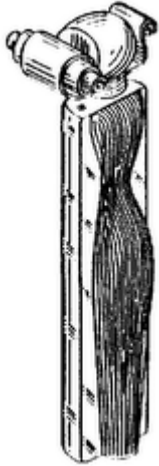
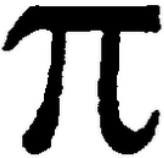
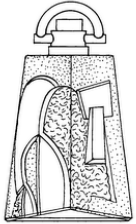
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>BIG BANG</b>	14	Timepieces and chronometric instruments and parts thereof namely watch cases, watch bands, watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, dress watches, diving watches, movements for clocks and watches, movements for watches	26/09/2006	3149003
 <b>HUBLOT</b>	14	Watches and Clocks and Parts Therefor; Chronometers; Chronographs; Costume Jewelry and Jewelry Made Wholly or in Part of Precious Metals	04/01/1983	1222529
	14	Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch straps, watch cases, dials for clock and watch making, clocks, wall clocks, chronometers and chronographs as watches	08/05/2015	4916069
 <b>UNICO</b>	14	Movements for clocks and watches	17/08/2009	3787659
<b>HUBLOT CLASSIC FUSION</b>	14	Horological and chronometric instruments, namely, watches, wristwatches, watch straps, watch cases, dials for clock-and watch making, clocks, wall clocks, chronometers and chronographs as watches	27/06/2017	5232251
<b>KEY OF TIME</b>	14	Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch bands, watch cases, dials, clocks, wall clocks, chronometers, chronographs	15/05/2012	4140869
<b>KING POWER</b>	14	Jewelry; horological and chronometric instruments, namely, watches, wristwatches, watch bands, dials, clocks, wall clocks, chronometers, chronographs	06/07/2010	3814806
<b>MAGIC GOLD</b>	14	Gold-based alloys and composites thereof and goods made of the aforesaid materials, namely, watches, wristwatches, watch straps, dials for clocks-and watch-making, clocks, grandfather clocks, chronometers, and chronographs for use as timepieces, all the foregoing containing gold	3/08/2013	4381674
<b>TECHFRAME</b>	14	Jewelry, precious stones; timepieces and chronometric instruments	26/07/2018	5500090
	14	Jewellery; horological and chronometric instruments, namely, watches, wristwatches, watchbands, watch cases, dials, clocks, wall clocks, chronometers, chronographs	24/11/2009	3715561


**KENZO**

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>KENZO</b>	3	Perfumery	Jan. 8, 1985	1312942
<b>KENZO JUNGLE</b>	3	Perfumery, namely toilet waters, perfumes	Nov. 19, 1996	2017313
	3	Perfumery, namely, toilet water, cosmetics, namely, beauty creams for the face and the body, body lotions	Sep. 10, 2002	2616977
<b>KENZOAMOUR</b>	3	Perfumes; toilet water	June 20, 2006	3106879
<b>UNIDENTIFIED FRAGRANCE OBJECT</b>	3	Perfumery	Aug. 10, 2010	3832756
	3	Perfumery	Nov. 29, 2011	4062441



**LVMH FRAGRANCE BRANDS**

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>GIVENCHY</b>	3	Perfume, toilet water, bath oil, face lotion and talcum powder	Sep. 5, 1972	942407
<b>YSATIS</b>	3	Toilet waters, cosmetic products-- namely, perfumed body cream, perfumed body lotion	Aug. 13, 1985	1353577
<b>XERYUS</b>	3	Toilet water; personal soaps; personal deodorant	June 23, 1987	1443773
<b>GIVENCHY</b> 	3	Bath soaps; perfumes, toilet water and cologne; lotions and creams for shaving; lotions, milks, creams and gels for the face and body; cosmetic preparations for the bath, namely, - gels, talc and and personal deodorants (deodorant sticks)	May 23, 1989	1539965
	3	Toilet soaps; perfumery; namely, perfumes, eau de cologne and toilet water; cosmetic preparations; namely, lotions, milks, creams and gels for the face and body, lipsticks, nail varnish, makeup foundation and powder, mascara, eye shadow, cosmetic pencils, beauty masks; suntan preparations; namely, gels and creams; cosmetic preparations for the bath; namely, gels, oils, creams, bath salts; deodorants for personal use	June 2, 1992	1689748
<b>AMARIGE</b>	3	Perfume, toilet water, cosmetic products; namely, lotions, milks, creams, gels for face and body, cosmetic preparations for the bath; namely, gels, creams, deodorant for personal use	Sep. 22, 1992	1717361
	3	Toilet water, toilet soap	Apr. 27, 1993	1767120
<b>INSENSE</b>	3	Perfumes, toilet water	Jan. 10, 1995	1872169
<b>TARTINE ET CHOCOLAT</b>	3	Toilet water	Mar. 10, 1998	2142392

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume	Aug. 11, 1998	2180108
<b>ORGANZA</b>	3	Perfume	Aug. 25, 1998	2184436
<b>HOT COUTURE</b>	3	Perfumes, and toilet water, lotions, for the body, body gel	Feb. 13, 2001	2427861
	3	Toilet soaps, perfumes, toilet water, deodorants for personal use, after-shave lotions, preparations for hair, namely, shampoos	Sep. 18, 2001	2489772
	3	Toilet water	July 2, 2002	2587049
<b>VERY IRRESISTIBLE GIVENCHY</b>	3	Perfumes, perfumery, toilet waters, lotions for the body; deodorants for personal use	Oct. 24, 2006	3161498
<b>ANGE OU DEMON</b>	3	Perfumes, perfumery, cosmetics	Dec. 18, 2007	3357425

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
 <p>The image shows a tall, rectangular perfume bottle for 'Ange du Démon' by Givenchy. The bottle is white with a black label in the center that reads 'ange du démon' in a stylized font. Above the label is a vertical line of small, round, metallic-looking beads. At the bottom of the bottle is the Givenchy logo, a square with a cross inside, and the word 'GIVENCHY' below it, with 'PARIS' in smaller letters underneath.</p>	3	Perfumes; eau de cologne and eau de toilette	Jan. 22, 2008	3371362
<b>PLAY</b>	3	Skin care products, namely, aftershave tonics; scented preparations, namely, eau de toilettes, fragrances for personal use	Nov. 3, 2009	3706948
<b>GIVENCHY</b>	3	Perfumery, cosmetics, makeup, non-medicated skin care preparations, non-medicated skin and facial cleaners, skin lightening preparations and non-medicated toiletries	Jan. 3, 2012	4079380

**LVMH SWISS MANUFACTURES S.A.**


<u>Trademarks</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
<b>HEUER (word)</b>	3,569,070	03-Feb-2009	Jewelry; horological and chronometric instruments, namely, watches, watchbands, chronometers, chronographs for use as watches, and clocks in class 14
<b>TAG HEUER</b>	2,281,436	28-Sep-1999	Clocks, watches and parts thereof
	5314173	24-Oct-2017	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches in class 14
	5314172	24-Oct-2017	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches in class 14
<b>TAG HEUER (word mark)</b>	1304885	21-Mar-2016	Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric

			instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches
<b>TAG HEUER logo (and device)</b>	1471988	12-Jan-1988	Time measuring instruments, namely, electronic stop watches, remote control mini-printer timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers in class 9  Clocks, watches and parts thereof in class 14




**MICHAEL KORS, L.L.C.**



<b><u>TRADEMARK</u></b>	<b><u>REGISTRATION DATE</u></b>	<b><u>REGISTRATION NUMBER</u></b>	<b><u>GOODS and SERVICES</u></b>
<b>MICHAEL KORS</b>	June 4, 1996	1977507	25: Ladies' clothing; namely, dresses, jackets, pants, skirts, shirts, blouses, shorts, sweaters, coats, swimwear.
<b>MICHAEL KORS</b>	April 1, 1997	2049326	25: Clothing for use by women; namely, anoraks; aprons; ascots; babushkas; bandanas; bathrobes; belts; blazers; blouses; bodysuits; boleros; boots; boxer shorts; brassieres; briefs; caftans; camisoles; capes; caps; cardigans; chemises; clogs; fur coats; suit coats; corselets; culottes; earmuffs; galoshes; garter belts; girdles; gloves; nightgowns; halter tops; hats; headbands; hosiery; jeans; jogging suits; jumpers; jumpsuits; kerchiefs; kimonos; leggings; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; negligees; nightshirts; overalls; overshoes pajamas; panties; pantsuits; pantyhose; parkas; pedal pushers; peignors; pinafores; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; stockings; stoles; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; underpants; vests; vested suits; and warm-up suits; and, clothing for use by men; namely, anoraks; ascots; bandanas; bathrobes; belts; blazers; boots; boxer shorts; briefs; capes; caps; cardigans; clogs; fur coats; suit coats; earmuffs; galoshes; gloves; hats; headbands; hosiery; jeans; jogging suits; kerchiefs; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; nightshirts; overalls; overshoes; pajamas; pantsuits; parkas; pedal pushers; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; vests; vested suits; and warm-up suits.
<b>MICHAEL KORS</b>	December 18, 2001	2520757	18: Handbags, billfolds, credit card cases, key cases, and tote bags.
<b>MICHAEL KORS</b>	December 18, 2001	2520758	9: Eyeglasses, eyeglass cases.
<b>MICHAEL KORS</b>	March 12, 2002	2547039	35: Retail store services in the fields of clothing, jewelry and clothing accessories.
<b>MICHAEL KORS</b>	April 22, 2003	2708259	3: Cosmetics; namely, body lotion, cologne, perfume, and shower gel.



<b><u>TRADEMARK</u></b>	<b><u>REGISTRATION DATE</u></b>	<b><u>REGISTRATION NUMBER</u></b>	<b><u>GOODS and SERVICES</u></b>
<b>MICHAEL MICHAEL KORS</b>	April 11, 2006	3080631	14: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, carrying cases, namely, attaché cases; bags, namely, tote bags; luggage; suitcases; handbags; purses; wallets; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, t-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear; footwear and headwear; belts.
<b>MICHAEL KORS</b>	October 17, 2006	3160981	14: Watches.
	December 18, 2007	3356080	18: Handbags and small leather goods, namely, wristlet bags.
<b>MK MICHAEL KORS</b>	May 27, 2008	3438412	9: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, eye shades, protective eye wear and eye wear for sports; handbags; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, T-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear, footwear and headwear; belts.
<b>MK MICHAEL KORS</b>	November 18, 2008	3535310	14: Watches.
<b>MICHAEL KORS</b>	November 8, 2011	4052748	14: Jewelry.
<b>MICHAEL MICHAEL KORS</b>	November 8, 2011	4052752	14: Jewelry and watches.
<b>MICHAEL KORS</b>	May 14, 2013	4334410	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.





<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
<b>MICHAEL MICHAEL KORS</b>	May 14, 2013	4334409	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.





**THE NORTH FACE APPAREL CORP.**

TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
5 DIMENSIONAL FIT		3994568	gloves
BACKSTYLER		4653409	organizing sporting events, namely free style ski contests; contests, namely video contests consisting of video submissions of ski events
BETTER THAN NAKED		4384202	apparel, namely tops and bottoms
BOMBASTIC		4418844	fabric sold as integral component of backpacks
CHIMNEY VENTING		3541726	clothing, namely, jackets, vests, pants, shells, bib overalls, ski bibs, pullovers and gloves
DRYWALL		4664041	bivouac sacks, namely, wind and water resistant bags into which a person can fit to protect themselves from exposure to the elements; eyewear; protective eyewear, back packs; lumbar packs; sports packs, sleeping bag pads; sleeping bags, tents, bottoms; footwear; gloves; head wear; jackets; outer jackets; rain wear; ski wear; tops
ETIP		4456114	gloves
EXPLORE FUND		4071167	grant making services, namely, providing funding to organizations working to increase participation in outdoor activities
EZ GROW		3931440	clothing for children, namely, parkas, anoraks, coats, jackets, wind-resistant jackets, pullovers, pants, side zip pants, shells, one-piece shell suits, ski wear, ski suits, ski vests, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rain wear, rain jackets, rain pants





TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
FLASH DRY		3857227	synthetic fibers and filaments for use in the manufacture of fabrics, textiles and yarns; yarn fibers, synthetic yarn; yarn, jeans fabric; knitted fabrics; nylon fabric; polyester fabric; textile fabrics for home and commercial interiors; textile fabrics for lingerie; textile fabrics for the manufacture of clothing, footwear; foundation garments; pants; short-sleeved or long-sleeved t-shirts; sweat pants; t-shirts; under garments; sports shirts; polo shirts; pullovers; dress shirts
FLASHDRY		4724069	baselayer bottoms; baselayer tops; bottoms; coats; footwear; foundation garments; gloves; jackets; pants; parkas; tops
FLASHDRY DESIGN		4716717	baselayer bottoms; baselayer tops; bottoms; coats; footwear; foundation garments; gloves; jackets; pants; parkas; tops
FLIGHT SERIES AND DESIGN		3535308	backpacks, bottle pockets, fanny packs, waist packs, rain covers used to cover all of the aforesaid; internal frame packs and hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube, sleeping bags and bivouac sacks, namely, sleeping bags that are normally used in association with traditional sleeping bags, thus eliminating the need for a tent when sleeping outdoors, tents and tent accessories, namely, rain flies and ground cloths, clothing, namely, non-aviation jackets, parkas, coats, bib overalls pants, vests, one-piece shell suits, shells, mittens, gloves, hats, rainwear, wind resistant jackets, shorts, shirts, t-shirts, leggings, tights, bras and sweaters; boots, namely,

TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
			hiking and trekking boots; shoes, namely, climbing, hiking, trail running, athletic, sneakers, slippers, and climbing slippers
HEAL CRADLE		3599066	footwear, namely, insoles as an integrated feature of footwear
HEATSEEKER		4115274	insulated fabric sold as an integral component of footwear, namely, athletic shoes and boots
HEATSEEKER & Design	<b>HEATSEEKER</b>	3815313	insulated fabric sold as an integral component of finished footwear, namely, athletic shoes and boots
HYDROSEAL		3630550	footwear
HYDROTRAK		3455200	footwear, namely, trekking boots and shoes, trail running shoes, hiking boots and shoes, athletic shoes, climbing shoes, climbing slippers
HYVENT		3103077	backpacks, rain covers, stuff sacks and organizer bags, trekking boots and shoes, athletic shoes, jackets, bib pants, one-piece shell suits, mittens, rain gear, parkas, side zip pants, shells, gloves, wind jackets, hiking boots and shoes, vests and pants
ICEPICK		3835454	footwear
MISCELLANEOUS DESIGN (N DESIGN)		1102407	retail store, mail order, and distributorship services in the field of camping and outdoor gear and sport equipment
MISCELLANEOUS DESIGN (N DESIGN)		1030071	backpacks, sleeping bags, tents, camping clothing, namely, rainwear, parkas, vests, trousers, shoes, gloves, headgear and snowshoes


TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
MISCELLANEOUS DESIGN (N DESIGN)		3630850	footwear; gloves; headgear, namely, hats, caps, headbands, visors, ear muffs, and the like; hosiery; jackets; mittens; pants; parkas; shirts; shorts; ski jackets; skirts; socks; tights; vests
MISCELLANEOUS DESIGN (S DESIGN)		3418103	footwear
MISCELLANEOUS DESIGN (S DESIGN)		3373851	backpacks, internal and external frame packs, sleeping bags, tents and tent accessories, namely, rain flies, ground cloths, and gear loft platforms used for storage, clothing, footwear, namely, t-shirts, shirts, tops, pants, side zip pants, shorts, vests, parkas, anoraks, coats, jackets, wind-resistant jackets, pullovers, sweaters, overalls, thermal underwear, hosiery, socks, tights, gloves, mittens, shells, one-piece shell suits, ski wear, ski suits, ski vests, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rainwear, rain jackets, rain pants
NEVER STOP EXPLORING		3630564	retail store and on-line retail store services in the field of apparel, camping and outdoor gear, and outdoor sporting goods equipment
NORTHOTIC		3450790	footwear, namely, trekking boots and shoes, trail running shoes, hiking boots and shoes, athletic shoes and climbing slippers
NUPTSE		3442183	clothing, namely, jackets, vests, and footwear
OPTIFIT		4455942	bags and backpacks
OPTIFIT-X		4700177	backpacks
PARK + PIPE OPEN SERIES		4095500	entertainment in the nature of competitions in the field of skiing; organizing sporting events, namely, athletic competitions in the field of skiing
ROLL CONTROL		4506183	insoles for footwear
SNAKE PLATE		3554653	footwear

TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
SUMMIT SERIES AND DESIGN		3349240	sunglasses, backpacks, duffel bags, internal and external frame packs, sleeping bags, tents and tent accessories, namely, tent storage bags, rain flies, vinyl ground cloths, tent pole storage sacks, and gear loft platforms used for storage, clothing, namely, jackets, parkas, coats, pants, bib overall pants, vests, one-piece shell suits, shells, mittens, gloves, hats, rainwear, wind resistant jackets, shorts, shirts, t-shirts, thermal underwear, and sweaters; boots, namely, hiking and trekking boots; shoes, namely, climbing, hiking, trail running, athletic, sneakers, and slippers, and climbing slippers
SUMMIT SERIES AND DESIGN		3479423	footwear
THE NORTH FACE		3541797	metal tent stakes
THE NORTH FACE		3294604	retail store, mail order, and distributorship services in the fields of camping and outdoor gear, books, food, hardware and sports equipment
THE NORTH FACE		983624	Backpacks, sleeping bags, tents, camping clothing namely rainwear, parkas, vests, trousers, shoes, gloves and headgear , snowshoes and skis
THE NORTH FACE AND DESIGN		2300758	shoes
THE NORTH FACE AND DESIGN		3294605	retail store, mail order, and distributorship services in the fields of camping and outdoor gear, books, food, hardware and sports equipment




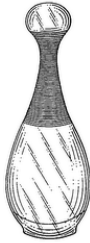
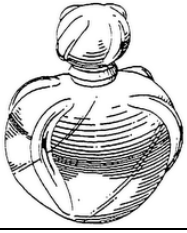
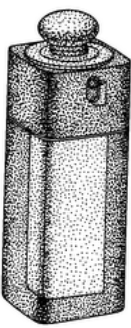
TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
THE NORTH FACE AND DESIGN		2097715	backpacks, sleeping bags, tents, clothing, namely, parkas, vests, jackets, anoraks, pants, ski bibs, gloves, mittens, underwear, hats, headbands, caps, ski suits, gaiters, shorts, shirts and belts
THE NORTH FACE AND DESIGN		3630846	footwear; head wear; rainwear; scarves; ski wear; socks
THE NORTH FACE AND DESIGN (HORIZONTAL)		3630565	clothing, namely, men's, women's, and children's t-shirts, shirts, tops, sweatshirts, sweatpants, pants, side zip pants, shorts, trousers, jeans, vests, parkas, anoraks, coats, jackets, wind-resistant jackets, jacket hoods, pullovers, sweaters, coverall, underwear, thermal underwear, boxer briefs, sleepwear, lingerie, loungewear, hosiery, socks, tights, gloves, mittens, shells, one-piece shell suits, ski wear, ski suits, ski vests, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rain wear, rain jackets, rain pants, gaiters, namely, neck gaiters, leg gaiters and ankle gaiters; skirts skorts, dresses, swimsuits, swim trunks, footwear, namely, athletic shoes (sneakers), train running shoes, climbing shoes, hiking shoes, slippers, climbing slippers, boots, trekking boots, hiking boots, snowshoes, clogs, sandals; headgear, namely, caps hats, headbands, bandanas, scarves, earbands, earmuffs, balaclavas, visors, beanies, belts
THE NORTH FACE AND DESIGN IN RED SQUARE (CLAIMING COLOR RED)		3538773	computer bags, all purpose sporting bags, backpacks, day packs, knapsacks, rucksacks, book bags, tote bags, handbags, duffel bags, knap sacks and duffel sacks, messenger bags, hip and lumbar packs, hip belts, shoulder bags, messenger bags, book bags, waist packs, fanny packs, day packs, shoulder bags, satchels, mountaineering bags, boston

TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
			<p>bags, internal frame packs and external frame packs, backpack bottle pockets, rain covers used to cover the aforesaid; hydration packs, namely, backpack hydration systems consisting of a backpack, a reservoir, and a mouthpiece connected to the reservoir by a tube; backpack shoulder harnesses; parts and fittings for all the aforesaid goods, walking sticks, alpenstocks, umbrellas and parasols, sleeping bags; covers for sleeping bags; sleeping bag pads; sleeping bag liners; sacks for carrying and storing sleeping bags; non-metal tent poles and tent stakes, hydration packs, namely, hydration system consisting of a reservoir and a mouthpiece connected to the reservoir by a tube, tents; tent accessories, namely, tent storage bags, rain flies, vinyl ground cloths, tent pole storage sacks, and gear loft platforms used for storage, clothing, namely, men's, women's, and children's t-shirts, shirts, tops, sweatshirts, sweatpants, pants, side zip pants, shorts, trousers, jeans, vests, parkas, anoraks, coats, jackets, wind-resistant jackets, jacket hoods, pullovers, sweaters, coveralls, underwear, thermal underwear, socks, tights, gloves, mittens; outerwear, namely, shells, one-piece shell suits, ski wear, ski suits, ski vests, ski jackets, ski bibs, bib overalls, bib pants, snowboard wear, snow pants, snow suits, rain wear, rain jackets, rain pants, gaiters, namely, neck gaiters, leg gaiters and ankle gaiters; skirts, skorts, dresses, swim trunks; footwear, namely, athletic shoes, sneakers, trail running shoes, climbing shoes, hiking shoes, slippers, climbing slippers, boots, trekking boots, hiking boots, snowshoes, clogs, sandals; headgear, namely, caps, hats, headbands, bandanas,</p>

TRADEMARK	TM LOGO	REGISTRATION NO	GOODS
			scarves, earbands, earmuffs, balaclavas, visors, beanies; belts, on-line retail store services, retail store services, mail order, catalogue and distributorship services, all featuring camping and outdoor gear and equipment, books, food, hardware, clothing, sportswear, eyewear, footwear, headgear, sports equipment and related accessories
THE NORTH FACE ENDURANCE CHALLENGE		3595442	organizing exhibitions and sporting events in the fields of skiing, snowboarding, running, climbing, and hiking
THE NORTH FACE NEVER STOP EXPLORING SPEAKER SERIES		3454860	arranging seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking; conducting seminars and lectures in the fields of adventure and endurance sports, namely, skiing, snowboarding, running, climbing, and hiking
THERMOBALL and Design		4716718	anoraks; baselayer bottoms; baselayer tops; bottoms; coats; footwear; gloves; headwear; jackets; outdoor gloves; pants; ski gloves; ski pants; snow pants; snowboard gloves; snowboard pants; tops
TNF WINTER GRIP		3044570	footwear
TRICLIMATE		3455206	clothing, namely jackets, parkas, pants, shirts, vests, shells, bib pants and one-piece shell suits
ULTRATAC		3558969	footwear
VAPORWICK		2067763	moisture wicking chemical compositions for articles of fabric
WINDWALL		2907291	jackets, wind resistant jackets and vests
WINDWALL		3923048	gloves
WRISTOVEN		4456402	gloves
ZLOFT		4467524	jackets

**PARFUMS CHRISTIAN DIOR**

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>Christian Dior</b>	3 & 5	Face and body creams, skin, face and body powders, lipstick, rouge and filled rouge compacts, perfumes, toilet water	Apr. 21, 1953	573430
<i>Miss Dior</i>	3 & 5	Perfumes, toilet waters, skin creams and lotions	July 14, 1953	577253
<b>DIORISSIMO</b>	3 & 5	Cosmetics and toilet preparations- namely, perfumes, toilet water	July 19, 1960	701515
<b>EAU SAUVAGE</b>		Men's eau de cologne		884294
<b>DIORESSENCE</b>	3 & 5	Perfumes	Jan. 19, 1971	906347
<b>DIORELLA</b>	3	Perfumes, toilet water, eau de cologne	Jan. 8, 1974	976471
<b>POISON</b>	3	Perfumes, eaux de toilette, milks for the care of the body	Nov. 13, 1984	1304580
<b>FAHRENHEIT</b>	3	Perfumes, face creams	Apr. 5, 1988	1482938
<b>DUNE</b>	3	Cosmetics, namely, creams, lotions body, perfumery	Feb. 13, 1990	1582150
<b>DOLCE VITA</b>	3	Perfume, toilet waters	Dec. 31, 1996	2027819
<b>CHRISTIAN DIOR</b>	3	Perfumes, eau de cologne, toilet waters; perfumed body milks, body lotions, body gels, body oils and body powders; perfumed bath and shower gels, perfumed soaps, perfumed moisturizing body creams, personal deodorants for the body; pre-shave and after-shave lotions, shaving foams and gels, emulsions and balms; shampoos, gels and lotions for body, creams, milks, lotions, gels and emulsions for the care of the face, hands and body, cream and gel masks; exfoliating creams, lotions and gels; mascara, eye liner, eye shadow, blush, pressed powder, loose powder, foundation make-up, foundation cream, foundation base, moisturizing cream base, lipstick, nail enamel, base and top coat for nails, nail polish remover, face and eye make-up remover; cleansing milks, gels and lotions for the face	Apr. 28, 1998	2153858

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfume, toilet waters, perfumned body milk, perfumed bath and shower foams and gels, perfumed soaps, perfumed moisturizing creams	May 22, 2001	2453926
<b>J'ADORE</b>	3	Perfume and toilet waters	May 29, 2001	2455674
	3	Perfume, eau de parfum spray, toilet water	Jan. 15, 2002	2529417
	3	Perfumes	Apr. 30, 2002	2564970
<b>J'ADORE</b>	3	Perfume, eau de toilette, and milks for the care of the body	Mar. 11, 2003	2696047
<b>HYPNOTIC POISON</b>	3	Perfume, toilet waters, perfumed body milk, perfumed bath and shower foams and gels	Oct. 7, 2003	2771657
<b>FAHRENHEIT</b>	3	Eau de toilette, summer eau de toilette, after-shave, after-shave balm, personal deodorants, shower gels	Mar. 16, 2004	2823387
	3	Perfume, toilet waters	Mar. 23, 2004	2824987

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
<b>DIOR ADDICT</b>	3	Perfume, toilet waters, lipstick	July 27, 2004	2867329
<b>PURE POISON</b>	3	Perfumery	Aug. 17, 2004	2874846
	3	Perfumery; cosmetics	June 21, 2005	2963354
	3	Perfumes	Oct. 25, 2005	3008784
<b>EAU NOIRE</b>	3	Perfumes	Dec. 27, 2005	3034741
<i>Miss Dior Chérie</i>	3	Perfumes	Apr. 25, 2006	3085164
	3	Perfumes, eau de cologne, eau de toilette, milks, lotions, creams, emulsions, and perfumed gels for body and face care	June 13, 2006	3104002
	3	Perfumery, perfumes, toilet waters	Nov. 28, 2006	3176192
<b>DIOR</b>	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen preparations, and hair care preparations	Sept. 25, 2007	3297261
<b>DIOR</b>	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal	Sep. 25, 2007	3297261

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
		deodorants, shower and bath gel, sun screen preparations, and hair care preparations		
<b>LA COLLECTION PARTICULIERE</b>	3	Perfumes, perfumery, eau de cologne	Oct. 28, 2014	4628811
<b>SAUVAGE</b>	3	Perfumery; toilet water; cosmetics; after-shave lotions; after-shave balms; deodorant for personal use; perfumed gels for the shower	Oct. 10, 2017	5304379

**PRL USA HOLDINGS, INC.**

<b><u>Trademark</u></b>	<b><u>Registration No.</u></b>	<b><u>Registration Date</u></b>	<b><u>Goods</u></b>
<b>POLO</b>	1,363,459	10/1/85	Clothing-namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats, and dresses.
<b>POLO</b>	1,446,173	7/7/87	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>RALPH LAUREN</b>	1,447,282	7/14/87	Frames for prescription and non-prescription lenses and complete sunglasses.
<b>POLO BY RALPH LAUREN and Design</b>	1,508,314	10/11/88	Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats, belts and socks and ladies' blouses, skirts, suits and dresses.
<b>RALPH LAUREN word mark</b>	1,624,989	11/27/90	Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
<b>RALPH LAUREN</b>	1,835,393	5/10/94	Jewelry.
<b>DOUBLE RL</b>	1,876,705	1/31/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>RRL DESIGN</b>	1,891,143	4/25/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>RRL RALPH LAUREN EST. 1993 and Design</b>	1,932,955	11/7/95	Wearing apparel, namely jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
<b>POLO SPORT</b>	1,951,601	1/23/96	Wearing apparel, namely pants, shorts, jackets, T-shirts, sport shirts, knit shirts, sweatshirts, hats, socks and footwear.
<b>RALPH LAUREN</b>	1,976,324	5/28/96	Clutches, shoulder bags, cosmetic bags, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, circular cosmetic and personal grooming bags, clothing and personal item bags with drawstrings for over the shoulder use, grooming kits in the nature of small traveling bags for carrying personal hygiene items, traveling bags designed for holding suits, tie cases, satchels, purses and other personal item bags with rigid top supports, garment bags for travel, traveling bags for carrying personal items and clothing, coin bags, drawstring pouches, overnight bags, wallets and key holders, all sold empty.



<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
<b>POLO JEANS CO.</b>	2,049,948	4/1/97	Wearing apparel, namely, jeans, T-shirts, knit shirts, sweatshirts, overalls, blouses, skirts, dresses and hats.
<b>DESIGN ONLY polo player astride horse</b>	2,052,315	4/15/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, pole bags, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>POLO RALPH LAUREN and Design</b>	2,077,082	7/8/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>RALPH</b>	2,175,394	7/21/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>CHAPS</b>	2,137,833	2/17/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
<b>LAUREN</b>	2,246,900	5/25/99	Wearing apparel, namely, topcoats, raincoats, jackets, suit jackets, suit coats, sport coats, sport jackets, blazers, blouses, shirts, shirt jackets, pants, skirts, dresses, sweaters, tee shirts, hats and scarves.
<b>RLX</b>	2,276,536	9/7/99	Wearing apparel, namely, pants, shorts, jackets, coats, woven shirts, T-shirts, knit shirts, sweaters, sweatshirts, blouses, skirts, dresses, hats, footwear, socks, hosiery and gloves.
<b>RL</b>	2,312,818	2/1/00	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, overalls, pants, sweaters, shorts, vests, ties, bathing suits, scarves, hosiery, bodysuits, belts, blouses, skirts, dresses, coats, hats and shoes.
<b>RUGBY</b>	2,339,652	4/11/00	Men's and women's clothing not specifically adapted to be worn while playing rugby, namely, jackets, vests, shirts, sweatshirts, t-shirts, men's shorts and pants, and women's shorts, dresses, blouses, [scarves,] belts and shoes
<b>LAUREN</b>	2,419,959	1/9/01	Handbags, clutches, shoulder bags, tote bags, backpacks, duffle bags, travel bags, suit bags, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>CHAPS</b>	2,505,790	11/13/01	Clothing, namely, sport shirts, sweaters, sweatshirts, t-shirts, shorts, jackets, pants, sport jackets and suits.







<b><u>Trademark</u></b>	<b><u>Registration No.</u></b>	<b><u>Registration Date</u></b>	<b><u>Goods</u></b>
<b>RALPH</b>	2,527,823	1/8/02	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
<b>POLO GOLF</b>	2,686,291	2/11/03	Wearing apparel, namely, shirts, sweaters, pants, sweatshirts and t-shirt.
<b>PINK PONY</b>	3,036,422	12/27/05	Tote Bags, Clothing – namely, sweaters and t-shirts.
<b>RL</b>	3,120,485	7/25/06	Eyeglasses, sunglasses, cases for eyeglasses and sunglasses.
<b>RALPH LAUREN GOLF</b>	3,213,555	2/27/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>RALPH LAUREN TENNIS</b>	3,215,910	3/6/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>RALPH LAUREN SPORT</b>	3,218,130	3/13/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests,










<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
			undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
<b>C (Stylized)</b>	3,225,869	4/3/07	Wearing apparel, namely, sport shirts, knit shirts, sweaters, sweatshirts, t-shirts, blouses, shorts, jackets, pants, jeans, overalls, skirts, dresses, hats, socks and swimwear.
<b>CHAPS</b>	2,137,833	2/17/98	Frames for prescription and non-prescription lenses and complete sunglasses
<b>PINK PONY</b>	3,245,586	5/22/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
<b>LAUREN JEANS COMPANY</b>	3,254,299	6/19/07	Wearing apparel, namely, jeans, vests, jackets, coats, shirts, sweatshirts, overalls, blouses, skirts, dresses, hats, pants, socks, gloves and footwear.
<b>RL</b>	3,687,528	9/22/09	Handbags, clutches, shoulder bags, tote bags, backpacks, saddle bags, duffle bags, travel bags, suit bags, satchels, hip packs, roll bags, carryalls, garment bags, suit cases, coin purses, drawstring pouches, briefcases, attaché cases, wallets, key cases, billfolds, tie cases, credit card cases, business card cases, grooming kits sold empty, cosmetics and toilet bags sold empty, shaving bags sold empty, and umbrellas.
<b>DESIGN ONLY</b>	4,169,636	7/10/12	Handbag.
<b>POLO</b>	1,532,557	4/4/89	Lotions for use after shaving
<b>RALPH</b>	2,562,975	4/23/02	Eau de toilette, skin and body lotions
<b>LAUREN</b>	1,489,796	5/31/88	Toilet water
<b>RALPH LAUREN</b>	1,222,278	1/4/83	Cologne, aftershave, aftershave balm, antiperspirant, personal deodorant, toilet water, body lotion, bath oil, body powder, perfume
<b>Horse &amp; Polo Rider Design</b>	1,212,060	10/12/82	Cologne, aftershave, aftershave balm, antiperspirant, toilet water
<b>RL</b>	2,891,892	10/5/04	Fragrances, namely, eau de toilette, namely, after-shave splash, after-shave balm
<b>RALPH LAUREN ROMANCE</b>	2,318,372	2/15/00	Eau de parfum
<b>POLO RED</b>	4,506,000	4/1/14	Eau de toilette, after shave preparations, body spray, and personal deodorant
<b>POLO BLUE</b>	2,782,617	11/11/03	Eau de toilette, after shave gel, shower gel, and personal deodorant
<b>POLO SPORT</b>	1,858,094	10/11/94	Toilette water, deodorants
<b>POLO BLACK</b>	3,130,913	8/15/06	Eau de toilette, after shave splash, after shave gel, shower gel, personal deodorant
<b>LAUREN RALPH LAUREN (Stylized)</b>	1,160,547	7/14/81	Cologne, toilet water, body lotion, and perfume
<b>CHAPS</b>	3,358,110	12/18/07	Eau de toilette







**TIMBERLAND, a division of VF OUTDOOR, LLC, and TBL LICENSING LLC**

<b>TIMBERLAND</b>	2,932,268	3/15/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
<b>TREE DESIGN</b>	2,947,228	5/1/05	Footwear; clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, shorts, headwear, gloves, neckwear, belts, sweatshirts, t-shirts, vests, socks.
<b>TIMBERLAND (word mark)</b>	1,592,927	4/24/90	Watches.
<b>TIMBERLAND (word mark)</b>	1,600,223	6/12/90	Shoe care products, namely water repellant.
<b>Timberland Tree circle design</b>	1,610,987	8/28/90	Shoe care products, namely water repellant.
<b>Timberland Tree circle design</b>	1,607,424	7/24/90	Watches.
<b>TIMBERLAND (word mark)</b>	1,523,598	2/7/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
<b>Timberland Tree circle design</b>	1,552,963	8/22/89	Clothing, namely coats, jackets, rainwear, sweaters, shirts, pants, caps, hats, gloves, scarf's, belts, t-shirts and vests.
<b>TIMBERLAND (word mark)</b>	1,588,288	3/20/90	Store services in clothing, footwear, outerwear, leather or leather and fabric accessories, such as, but not limited to, portfolios, handbags, belts, keychains, calendar books, wallets, tie cases, and the like, shoe care products and watches.
<b>TIMBERLAND (word mark)</b>	1,849,012	8/9/94	Sunglasses.
<b>Tree design</b>	1,843,478	7/5/94	Sunglasses.
<b>TBL</b>	2,112,526	11/11/97	Clothing, namely, jackets, hats, shirts and sweatshirts.
<b>Timberland Tree circle design</b>	1,502,205	8/30/88	Leather goods, namely, key fobs, luggage, tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and briefcases.
<b>TIMBERLAND (word mark)</b>	1,502,204	8/30/88	Leather goods, namely, key fobs, luggage tags, credit card cases, wallets, portfolio type briefcases, duffel bags, backpacks and briefcases.
<b>TIMBERLAND word with tree circle design</b>	1,355,531	8/20/85	Clothing, namely footwear, shirts, jackets, coats, sweatshirts, T-shirts, jerseys, sweaters, vests, belts and hats.
<b>TIMBERLAND (word mark)</b>	1,300,704	10/16/84	Footwear, namely, men's women's and children's boots, work shoes, hiking shoes, boat shoes and other footwear.
<b>Timberland Tree circle design</b>	1,075,061	10/11/77	Footwear, namely, men's, women's and children's boots, work shoes and hiking shoes.

**RIVER LIGHT V, L.P. and TORY BURCH LLC**

<u>Name of Mark</u>	<u>Depiction</u>	<u>Reg No.</u>	<u>Int'l Class</u>	<u>Goods/Services</u>
TT Design		3029795	004 014 018 024 025	Candles.  Jewelry.  Accessories, namely, handbags, umbrellas and cosmetic bags sold empty.  Housewares, namely, [ bed sheets, table linens and ] towels  Clothing, namely, shirts, tops, sweaters, pants, skirts, shorts, dresses, bathing suits, bikinis, sarongs, shoes, socks, belts, [ undergarments, ] robes and headwear; Outerwear, namely, scarves, jackets, vests and coats.
TT Design		4432775	003	Cologne; Cosmetic preparations for body care; Cosmetics; Fragrances for personal use; Non-medicated skin care preparations; Perfumes.
TT Design		4045568	009	Eyewear; Eyewear cases.
TT Design		4213405	009	Cell phone cases; Leather protective covers specially adapted for personal electronic devices; Protective covers and cases for cell phones, laptops and portable media players.
TT Design		4664182	014	Watches.
TT Design		3563326	018 025	A full line of handbags. A full line of women's clothing and footwear.

TT Design		4213404	018	Backpacks; Beach bags; Business card cases; Coin purses; [Dog collars; Dog leashes]; Overnight bags; [Pet clothing]; Wallets; Wristlet bags.
TT Design		4150523	018	Leather key chains.
TT Design		4029068	025	[Socks]; Robes.
Single T		4345877	009	Cell phone cases; Eyewear; Leather protective covers specially adapted for personal electronic devices; Protective covers and cases for cell phones, laptops and portable media players; Sunglasses.
Single T		4345878	014	Jewelry.
Single T		4345879	018	Handbags; Wallets.
Single T		4345880	025	Footwear; Scarves; Shirts; Sweaters.
TT No Circle		4382707	009	Cell phone cases; Eyewear; Leather protective covers specially adapted for personal electronic devices; Protective covers and cases for cell phones, laptops and portable media players; Sunglasses.
TT No Circle		4363739	014	Jewelry.

TT No Circle		4317165	018	Business card cases; Cosmetic cases sold empty; Handbags; Leather pouches; [Luggage]; Purses; Tote bags; [Umbrellas]; Wallets; Wristlet bags.
TT No Circle		4345875	025	Belts; Dresses; Footwear; Hats; Jackets; [Pajamas]; Pants; Scarves; Shirts; [Skirts]; Sweaters; Swimwear.
TT on Eyewear		3920528	009	Eyewear.
Structured T		4242007	009	Eyewear.
Structured T		4459720	018	Backpacks; Cosmetic cases sold empty; Handbags; Leather pouches; Tote bags.
Structured T		4365683	025	Belts, footwear.
TORY BURCH	TORY BURCH	4432774	003	Cologne; Cosmetic preparations for body care; Cosmetics; Fragrances for personal use; Non-medicated skin care preparations; Perfumes.
TORY BURCH	TORY BURCH	4205354	009	Cell phone cases; Leather protective covers specially adapted for personal electronic devices; Protective covers and cases for cell phones, laptops and portable media players.
TORY BURCH	TORY BURCH	3758631	009	Eyewear; Eyewear cases.
TORY BURCH	TORY BURCH	3428816	014	Jewelry.
TORY BURCH	TORY BURCH	4656700	014	Watches.
TORY BURCH	TORY BURCH	4205353	018	Backpacks; Beach bags; Business card cases; Coin purses; [Dog collars; Dog leashes]; Overnight bags; [Pet clothing]; Wallets; Wristlet bags.

TORY BURCH	TORY BURCH	3428374	018	Cosmetic bags sold empty; Handbags; [Umbrellas].
TORY BURCH	TORY BURCH	3428373	025	Coats; Dresses; Footwear; Headwear; Jackets; Pants; Shirts; Shorts; Skirts; [Sleepwear]; Sweaters; Swim wear; Tops ; [Underwear].